

From: Betty Lawrence Betty.Lawrence@humboldtcountynv.gov
Subject: RE: Public Records Request
Date: May 12, 2025 at 12:01 PM
To: Matthew Hardin hardinlawpllc@icloud.com
Cc: Russell Greer russmark@gmail.com, Anthony Gordon Anthony.Gordon@humboldtcountynv.gov



Good morning – Per your request, I have attached the e-mails between myself and Mr. Greer beginning August 25, 2022 to August 10, 2023. I have included one from Jessica Smith with the GIS department only because I reference this e-mail in my e-mail of 8/10/2023 to Mr. Greer.

Betty Lawrence
Senior Planning Technician

From: Matthew Hardin <hardinlawpllc@icloud.com>
Sent: Monday, May 12, 2025 8:10 AM
To: Betty Lawrence <Betty.Lawrence@humboldtcountynv.gov>
Cc: Russell Greer <russmark@gmail.com>
Subject: Public Records Request

Good morning, Ms. Lawrence.

Pursuant to the Nevada Public Records Act, I hereby request copies of any email correspondence in your custody, which email correspondence:

- 1) Is to or from an individual named Russell Greer; and
- 2) Relates to the topic of adult entertainment or prostitution; and
- 3) Is dated at any time within the past four calendar years.

Pursuant to *Las Vegas Review Journal v. Clark County School District*, 134 Nev. Adv. Op. 84 (2018), I wish to inform you that there is extensive public interest in the release of these documents. Specifically, Mr. Greer appears to be a prolific advocate for prostitution in rural communities across Nevada and elsewhere, and also a prolific litigant in the federal and state courts on topics both related and unrelated to prostitution. Mr. Greer is also documented to have a misdemeanor conviction arising from inappropriate behavior towards one woman in Utah, and has been the subject of at least three separate personal protection or restraining orders, all of which arise from further allegations of unlawful behavior towards women. Additionally, Mr. Greer appears to have made representations to the U.S. District Court for the District of Utah on May 2, 2025 that he could not attend a virtual hearing scheduled in that Court on May 6, 2025 because he would be attending an “emergency” meeting of the Winnemucca City Council of which he did not have advance notice, apparently with reference to a topic on which he has communicated with you and perhaps other Humboldt County officials regarding various lots in Winnemucca.

Public records you might release in response to this request will shed light not only on Mr. Greer’s broader advocacy for the expansion of prostitution in Humboldt County and his behavior towards women, but will also shed light on the extent to which Mr. Greer has been honest or dishonest to the federal court in Utah.

Thank you for your prompt attention to this request. Please let me know if you need any

further information from me to facilitate your search for records or to evaluate the extent of the public interest in their release. On information and belief, Mr. Greer may have used russmark@gmail.com or russellgreer27@icloud.com to communicate with you.

Thank you,

Matthew D. Hardin

Hardin Law Office

Direct Dial: 202-802-1948

NYC Office: 212-680-4938

Email: MatthewDHardin@protonmail.com

Records Request-Greer.pdf

515 KB

